

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:24-CR-287-O

NATHAN REIS (01)

**FACTUAL RESUME**

- I. Plea: The defendant is pleading guilty to Count One of the Superseding Indictment, which charges Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C. § 1349 (18 U.S.C. § 1343).
- II. Penalties: The maximum penalties the Court can impose for Count One include:
- a. imprisonment for a period not to exceed 20 years;
  - b. a fine not to exceed \$250,000, or twice any pecuniary gain to the defendant or loss to the victim(s);
  - c. a term of supervised release not to exceed 3 years, which may be mandatory under the law and will follow any term of imprisonment. If the defendant violates any condition of supervised release, the Court may revoke such release term and require that the defendant serve any or all of such term as an additional period of confinement;
  - d. a mandatory special assessment of \$100;
  - e. restitution to victims or to the community, which may be mandatory under the law, and which the defendant agrees may include restitution arising from all relevant conduct;
  - f. forfeiture; and
  - g. costs of incarceration and supervision.

III. Elements of the Offense: The government must prove the following elements as to Count One of the Superseding Indictment:

First: That the defendant and at least one other person made an agreement to commit the crime of wire fraud, in violation of 18 U.S.C. § 1343, as charged in the Superseding Indictment;

Second: That the defendant knew the unlawful purpose of the agreement; and

Third: That the defendant joined in the agreement willfully, that is, with the intent to further the unlawful purpose.

The elements of wire fraud—the object of the offense—are as follows:

First: That a scheme to defraud existed;

Second: That the scheme to defraud employed false material representations or pretenses;

Third: That the defendant transmitted or caused to be transmitted by way of wire communications, in interstate or foreign commerce, any writing, signal, or sound for the purpose of executing such scheme;

Fourth: That the defendant acted with a specific intent to defraud.

IV. Stipulated Facts:

From in or around April 2020 until in or around May 2021, in the Fort Worth Division of the Northern District of Texas and elsewhere, **Nathan Reis** agreed and conspired with others to commit wire fraud. It was part of the conspiracy and scheme that **Reis** and others knowingly agreed to submit applications for Paycheck Protection Program (PPP) loans containing false representations related to facts material to eligibility for the loans and the amount of the loans. **Reis** and his coconspirators submitted these loan applications via interstate wire from in or around Scottsdale, Arizona to financial institutions headquartered in Phoenix, Arizona; Redwood City, California; San Diego, California; San Francisco, California; and Bedford, Texas, in the Northern District of Texas.

It was also part of the conspiracy and scheme that, beginning in April 2020, **Reis** and his coconspirators submitted fraudulent applications for PPP loans for themselves and their businesses. In order to deceive lenders and the U.S. Small

Business Administration (SBA) into issuing loans in amounts for which the applicants were not eligible, **Reis** and others fabricated tax documents, altered bank statements, and made other material misrepresentations.

As part of the conspiracy, in or about April 2020, **Reis** created and submitted fabricated tax documents falsely representing that his company, Juuice Inc., paid employees, including **Reis** and Stephanie Hockridge. Based on the misrepresentations, **Reis** knowingly obtained a fraudulent PPP loan of around \$69,870 on behalf of Juuice Inc.


Similarly, **Reis** and his coconspirators applied for the following loans, among others, under materially false representations:

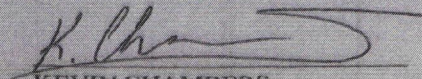
- June 2020 – Juuice LLC
- June 2020 – Body Politix
- July 2020 – James Flores
- August 2020 – Vivian Arriaga
- August 2020 – Coconspirator-1
- January 2021 – Coconspirator-1
- January 2021 – Coconspirator-1
- January 2021 – Coconspirator-1
- February 2021 – Body Politix

**Reis** and others founded Blueacorn in 2020, purportedly to assist small businesses and individuals in obtaining PPP loans. Reis and others used multiple entities to do business as “Blueacorn” in 2020 and 2021. Beginning in or around March 2021, Reis was not involved in active participation in the corporate operations of Blueacorn. However, he remained in the conspiracy through in or around May 2021.

Through Blueacorn, **Reis** and his coconspirators submitted and caused to be submitted PPP loan applications that they knew contained materially false information in order to make more money, causing Lender-2, based in Bedford, Texas to transfer loan funds to borrowers, including borrowers located outside of the Northern District of Texas. As part of the conspiracy, **Reis** and his coconspirators charged borrowers fees based on a percentage of the loan amounts that were funded.



X   
NATHAN REIS  
Defendant

  
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